

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
PAUL DAVID ROBERTS and	:	
CLAUDIA ANNE ROBERTS,	:	CHAPTER 13
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	CASE NO. 5-25-bk-00281-MJC
Movant	:	
	:	
PAUL DAVID ROBERTS and	:	
CLAUDIA ANNE ROBERTS,	:	
Respondents	:	

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 20<sup>th</sup> day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtors’ Plan for the following reason:

1. Debtors’ Plan violates 11 U.S.C. §1322(a)(1) and §1325(b) in that Debtors have not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtors’ disposable income is greater than that of which is committed to the Plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Line 46 should provide for an increase in income from that reported on Line 2 (for Debtor #2).

WHEREFORE, Trustee alleges and avers that Debtors’ Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

By: /s/ Agatha R. McHale, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20<sup>th</sup> day of May 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Paul Murphy-Ahles, Esquire  
Dethlefs, Pykosh & Murphy  
2132 Market Street  
Camp Hill, PA 17011

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee